

16 March 2018

Karen Harragon
Director
Social and Other Infrastructure Assessments
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Karen,

**RE: COUNCIL SUBMISSION REGARDING EXHIBITION OF HEALTH SERVICES
ADMINISTRATION BUILDING, ROYAL NORTH SHORE HOSPITAL, ST
LEONARDS (STATE SIGNIFICANT DEVELOPMENT - SSD 8816)**

I write to you regarding the exhibition of the development application for the proposed Health Services Administration Building at Royal North Shore Hospital, St Leonards (State Significant Development - SSD 8816), located within what is known as Precinct 4.

This application follows on from the previous NSW Health Infrastructure request to the Department of Planning and Environment for Secretary's Environmental Assessment Requirements (SEARs), which Council provided comments on dated 25 October 2017.

Willoughby City Council appreciates the opportunity to provide further comments on this matter.

Two major concerns are raised regarding this development application:

1) Health Administration building use

The application proposes a modern office building to cater for non-clinical administration uses that are not specific to the functioning of the RNSH. The proposed building facilitates the co-location of state wide health services.

It is considered that the proposed building could be located in nearby commercial zones rather than the RNSH site, where administration and office type uses are permissible uses. It would seem that the main attraction to Health Infrastructure in the use of Precinct 4 in this manner is the avoidance of land costs. While to some extent this is understandable, it is noted that the RNSH site is limited in size, in a location surrounded by increasing residential and commercial densities and represents a hospital of regional importance, which will need to consider future expansion to meet the health needs of a growing population.

Notwithstanding that this application has already been deemed appropriate for consideration as State Significant Development by Ministerial declaration on 13 October 2017, concern continues to be raised with the use of RNSH land for non-clinical purposes not directly

related to the functioning of the RNSH and the potential long term implications for future provision and expansion to meet regional health needs. It is considered inappropriate that the RNSH site should be seen by NSW Health Infrastructure as a site for the co-location of state wide administration services at the expense of regional health services.

2) Vacant section of Precinct 4 adjacent Herbert Street – referred to as Site 4b

It is noted that the proposed landscaped site 4b is temporary and that future development will occur in this location (unidentified in this application). Council looks forward to the opportunity to provide comment on the redevelopment of this site when an application is made, with particular regard to the relationship to Herbert Street, the pedestrian overpass to St Leonards Station and potential public open space opportunities.

Council has previously objected to the deletion of the Precinct 7 Pocket Park from the Statement of Commitments contained within the Preferred Project Report. This commitment states:

“The Precinct 7 Pocket Park will be located on the corner of Westbourne and Herbert Street and will have an area of not less than 2,900m². The park will be designed and constructed as a soft landscape space to a standard not less than relevant Willoughby City Council’s standard for new local parks, and upon completion will be dedicated to Willoughby City Council.”

The loss of a pocket park (2,900m²) from the hospital site is considered to be an important issue, as the provision would positively contribute to the amenity of hospital patients and staff as well all users of the RNSH site generally. If this open space is proposed to be relocated from Precinct 7, then an alternative location should be identified and it is considered that potential public open space opportunities exist within site 4b. If an alternative location is not identified and made available for public comment, and the proposed pocket park is to be simply deleted, then strong objection is raised.

Other issues to be considered in the assessment of this development application are as follows:

3) Temporary residential accommodation

Council has previously emphasized, and continues to emphasize, the importance of providing temporary accommodation on the RNSH site.

Concept Plan MP 06_0051 Modification 7, approved on 20 July 2017 by the Minister for Planning, altered the provision of temporary accommodation as follows:

“M1 Terms of Approval 1(e) (v):

A minimum of 15,000m² shall be developed for the purpose of temporary accommodation in Precinct 4 and Precinct 5, of which:

- A minimum of 10,000m² shall be developed for the purposes of nursing and student accommodation;*
- A minimum of 5,000m² shall be developed for the purpose of short term, hotel style accommodation; and*
- A minimum of 7,500m² of temporary accommodation shall be developed in Precinct 4.”*

The Ethos Urban Planning Report supporting the application states (P.39):

"While not part of this proposal, nothing in this application prevents the adjoining land (site 4b) in Precinct 4 from being redeveloped for the purposes of temporary accommodation. Approximately 15,368m² of GFA is available for the purposes of temporary accommodation, residential, or employment related uses (retail)."

No objection is raised by Council to the location of temporary accommodation on site 4b within Precinct 4, as well as Precinct 5. It is noted that under the existing conditions of approval, temporary accommodation will make up approximately 50% of GFA on site 4b.

4) Impact on Gore Hill Oval and Park

The importance of Gore Hill Oval and Park should not be underestimated, as it plays a critical open space and amenity role for the overall RNSH site as well as the immediate locality and wider region. The relationship between the western side of Reserve Road and any development on the eastern side must be managed carefully.

The Modification to Precinct 4A should consider any impacts on Gore Hill Oval and Park, being an adjacent important open space area, as follows:

- The visual impact of any building in Precinct 4A, including reflectivity. An architectural response regarding how the building has been designed should be provided to address this concern.
- Solar access impacts. In this regard an analysis should be provided at mid-winter.
- Whether the landscaping on Precinct 4A positively contributes to the landscaping on Gore Hill Oval and Park, and in particular that adjacent Reserve Road (being a major entry point to the Hospital site). It is considered that an opportunity exists to improve the visual quality of this highly utilised area.

5) Impact on Reserve Road and hospital access

It should be noted that Council has significant upgrading and improvement plans for Gore Hill Oval and Park during 2018. Ongoing communication between Infrastructure Health and Council is encouraged to minimise impacts on Reserve Road and hospital access.

Council continues to support improvements to the Royal North Shore Hospital and commends the State Government for its commitment to this major health precinct in the Willoughby Local Government Area.

Should you have any enquiries regarding this submission please contact Strategic Planner, Craig O'Brien on 9777 7647 or email Craig.Obrien@Willoughby.nsw.gov.au.

Yours sincerely,



Ian Arnott
PLANNING MANAGER